

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

No. 4:24-cr-478

**SHELDON DOUNN
Defendant.**

UNOPPOSED MOTION FOR CONTINUANCE

Comes now, Judith Shields, attorney for Sheldon Dounn and moves this Court to continue the deadlines established in the Court's Scheduling Order (Doc. #16) for at least three months, and in support thereof would respectfully show the court the following:

1. The current order has the following deadlines:
 - a. January 3, 2025: Motions deadline
 - b. January 13, 2025: Responses deadline
 - c. February 3, 2025: Pretrial conference
 - d. February 10, 2025: Jury selection and trial
2. This indictment occurred after a multi-year investigation. Counsel has received massive number of documents, wiretaps, and forensic electronic data totaling terabytes of data to be reviewed.

3. Counsel is requesting additional time so she may review the discovery
4. For these reasons, Judith Shields moves that all deadlines in the Order be extended by at least three months.
5. An executed waiver of speedy trial has been filed in this cause.
6. The law permits a continuance under these grounds under Title 18, United States Code, section 3161(h)(7)(A) and (B)(iv), as an “ends of justice” continuance, and all parties agree that this is a properly excludable delay.

Respectfully submitted,

/s/ Judith Shields

Judith Shields
SDTX No, 424027
SBOT 00793271
Attorney for Sheldon Dounn
10655 Six Pines, Suite 230
The Woodlands, Texas 77380
Phone: 936-703-5002
Fax: 877-900-2822
JudithShieldsAttorney@gmail.com

CERTIFICATE OF CONFERENCE

On January 5, 2025, I communicated with Assistant United States Attorney Andrew Pennebaker about the contents of this motion by email. He does not oppose the granting of the motion.

/s/ Judith Shields

Judith Shields

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was delivered to all counsel of record, on January 6, 2025, via ECF.

/s/ Judith Shields

Judith Shields